ALJ DATA REQUESTS

Ameritech, please file a response to the following by with the clerks office by
September, 14, 2001

1)   On page 3 of the Ameritech proposed Remedy Plan, under Section 4.0
     Qualifications to use Z-Test, in the fourth paragraph, there is a written
     description of how to calculate the Z-statistic for benchmark measures.

     a)   Please provide the actual formulas used for calculating the Z-
          statistic for benchmarks for interval, rate and proportion measures,
          similar to the formulas provided on page 2 for parity measures.

2)   On page 3 of the Ameritech proposed Remedy Plan, under Section 4.0
     Qualifications to use Z-Test, in the fifth paragraph, it states that for parity
     measures with 29 or less data points, Ameritech will apply one of the
     following alternatives.

     a)   Which alternative does Ameritech propose?

     b)   If the alternative Ameritech proposes is Alternative 2, please
          provide a step by step description for calculating the Fisher Exact
          Permutation Test?

     c)   Step (1) for averages and ratios, under Alternative 2, says to
          "choose a sufficiently large number T."

          Let N be the maximum number of permutations possible:
          $N \equiv C_{n_C + n_I}^{n_C}$, where n_c and n_I are CLEC and Ameritech's sample
          sizes.

          Ameritech should specify the value for T for interval, proportion and
          rate permutation tests in this proceeding. Specifically Ameritech
          should specify T as

          T = **Min** $\{N, T^*\}$, where T^* is a specific number that Ameritech must
          define.

3)   These questions pertain to performance marked "no critical z
     allowance"

     a)   Please provide mathematical expressions on how parity
          tests are conducted on measures marked with "no critical z
          allowance" or "Critical z allowance does not apply"

b)   Please provide mathematical expressions on how remedies
     are calculated for measures that fail parity tests and are
     marked with "no critical z allowance" or "Critical z allowance
     does not apply"

c)   Please provide mathematical expressions on how
     benchmark tests are conducted on measures marked with
     "no critical z allowance" or "Critical z allowance does not
     apply"

d)   Please provide mathematical expressions on how remedies
     are calculated for measures that fail benchmark tests and
     are marked with "no critical z allowance" or "Critical z
     allowance does not apply"

**The following questions are based on Ameritech response to ALJ Cross
Exhibit 4.**

4)   On page 2, it states:

     "For all qualifying sub-measures that have between 10 and
     100 observations, the base remedy amount are multiplied by
     a factor of 4."

     a)   For qualifying sub-measures that have more than 100
          observations, are they also multiplied by 4?

     b)   If not, please specify how these sub-measures are treated.

5)   Please provide an updated version of the "Exceptions to Z-Value
     and Remedy Calculations by Measure" (p. 13), in particular,
     deleting all provisions that are not applicable in Illinois.